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The Swedish Government
The Swedish Parliament
The European Commission
The European Parliament

Europaforum Northern Swedens views on the Proposal for a Directive on Soil Monitoring and Resilience

Europaforum Northern Sweden (EFNS) is a network for politicians at the local and regional levels from Norrbotten, Västerbotten, Jämtland Härjedalen and Västernorrland. EFNS is a meeting place and a knowledge arena for discussion and analysis of the impacts of EU policy on northern Sweden. EFNS monitors European issues to influence EU legislation, the EU's strategies and action programmes and the EU's budget. The objective of EFNS is to safeguard the interests of northern Sweden both in the European arena and in relation to the national level in matters with a clear European perspective.

Europaforum Northern Sweden (EFNS) welcomes the ambition behind the Proposal for a Directive on Soil Monitoring and Resilience. The land is our most important heritage which needs to be protected. However, we see problems with using the same model for monitoring and measures for widely differing soil types within large geographical areas. Arctic mountains and vast forests have a weak connection to fruit cultivation in southern Europe.

In Sweden, with a large bioeconomy from forestry and agriculture, we are well aware of the importance of soil health and regularly measure its condition. We generally have good soil health in Sweden.

EFNS argues that:

- The proposal should be withdrawn and re-worked. EFNS cannot see that the costs correspond to the expected benefits.
- EFNS questions whether it is reasonable to use the same model for monitoring such different land types as agriculture, forestry and contaminated sites in such a geographically vast and diverse area as the EU.
- Agricultural lands within the EU is already environmentally managed through the Common Agricultural Policy (CAP)
- Sweden already has an extensive and well-functioning system for monitoring of soil health.
- In northern Sweden, a large and sparsely populated Arctic region, there is a risk that the Soil Directive will be extra expensive to implement.
- We say no to increased central EU-monitoring of all land in Sweden by satellite.
- We say no to the directive's proposal on the use of delegated acts.
- EFNS supports Sweden's national views on the importance of respect for member states' competences and existing national processes in regards to soil health.



The proposal should be withdrawn and re-worked. EFNS cannot see that the costs correspond to the expected benefits. It is important to pay attention to soil health and that is already being done at a national level. The European Commission's information gathering should therefore take the form of a request to the member states, which then communicate the requested data in a form that may be compiled in a suitable way by the European Commission.

EFNS questions whether it is reasonable to use the same model for monitoring of such different land types as agriculture, forestry, and contaminated sites in such a geographically diverse and vast area as the EU. The indicators stated in the directive seem to be adapted for agricultural lands and are directly incorrect for forest land in Sweden. We do not have some of the problems that the Soil Directive would require us to measure at least every five years, such as salinity and phosphorus content in woodland soils. EFNS see a risk that resources will be wasted on measuring indicators with no value, instead of focusing resources on locally known problems.

Agricultural lands within the EU is already environmentally managed through the Common Agricultural Policy (CAP) and the measures that the Soil Directive specifies for soil improvement are already very well known in agriculture. For example, the importance of crop rotation, nitrogen-fixing plants like clover in grasslands and limited ploughing. Subsidies that steer towards soil improvement and increased biodiversity, such as grazing cattle, are already in the CAP and can be increased if necessary.

Sweden already has an extensive and well-functioning system for monitoring of soil health. The condition of the soil is a constant focus in the biological green industries for the right choice of crops, fertilizers and monitoring of environmental impacts. For woodland monitoring, we have 40-year time series with relevant indicators adapted to Arctic woodland. A further system on top of the existing national systems does not seem justified.

In northern Sweden there is a risk that the Soil Directive will be extra expensive. There are fewer citizens per square kilometer here than elsewhere in the EU. In its impact assessment the European Commission assesses that the costs will be higher for Sweden as a nation due to fewer inhabitants and large areas of land. In northern Sweden, a large and sparsely populated Arctic region, there is therefore a risk that the Soil Directive will be extra costly to implement.

We say no to increased central monitoring of all land in Sweden by satellite. Monitoring of individual citizens in Sweden and their land should be governed nationally and not by the EU Commission. With the increasing technological development, issues around privacy need to be discussed. What we decide now may apply for a very long time. We do not know who will be directing surveillance and measures against individual citizens and businesses in the European Commission in 50 or 100 years' time from now.



In addition to this, monitoring soil health in forest lands by satellite may be ineffective. The layer of tree crowns and ground cover with blueberry bushes risks preventing clear signals, according to Swedish soil experts.

We say no to the directive's proposal on the use of delegated acts.

Europaforum Northern Sweden argues, as the Swedish Government also has expressed, that the Commission should not be given the authority to implement tightening of the requirements on the member states in the directive through delegated or implementing acts. These acts are carried out without democratic transparency and therefore risk becoming less transparent, adapted and less effective. Their use also risks increasing opposition to EU cooperation.

EFNS supports Sweden's national views on the importance of respect for the member states' competences as well as existing national processes within soil health. The Soil Directive may regulate issues that can be considered to fall within national competence at several different levels. We therefore call for a great deal of flexibility in any implementation, and for respect of the principles of subsidiarity and proportionality. Furthermore, the Swedish local self-government, and the municipal planning monopoly need to be respected, for example on the basis of proposed principles for the appropriation of land (Article 11). In particular, EFNS argues that the Soil Directive should enable, and not impede increased urban development. This applies not the least to the military build-up within the total defence, and investments aimed at the green transition.

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